Mr. Tom Peck
Starcraft Automotive Corporation
P.O. Box 1903
Goshen, IN 46526

Re: 039-12642
Significant Source Modification to:
Part 70 permit No: T 039-6130-00011

Dear Mr. Tom Peck:

Starcraft Automotive Corporation, was issued a Part 70 permit T 039-6130-0011 on June 17, 1999 for stationary custom recreational vehicle manufacturing plant. An application to modify the source was received on August 21, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(h) One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(I), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

ERG/EG

cc: File - Elkhart
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Starcraft Automotive Corporation
2703 College Avenue
Goshen, Indiana 46526

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-6130-00011	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 17, 1999

First Significant Permit Modification, SPM 039-11338-00011 issued on April 20, 2000

First Significant Source Modification No: SSM 039-12642-00011	Pages Affected: 5, 5a, 27, 27a, 28, 29, 30, 30a, 31, 31a
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom recreational vehicle manufacturing plant, that converts stock vans to conversion vans.

Responsible Official:	Tom Peck
Source Address:	2703 College Avenue, Goshen, Indiana 46526
Mailing Address:	P.O. Box 1903, Goshen, Indiana 46526
SIC Code:	3716
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) surface coating booth partitioned into four (4) sections, identified as EU-49, EU-50, EU-51, and EU-52, exhausting to stacks SV-18, SV-19, SV-20 and SV-21, respectively with a maximum capacity of coating parts for seven (7) vans per hour, using water pan for overspray control, utilized for fiberglass, and plastic substrates, equipped with HVLP and airless spray guns.

(b) Two (2) sealer booths, identified as EU-38 and EU39, emitting to stacks SV-7 and SV-8 respectively. Booth EU-38 is capable of using 0.90 gallon of coating per hour (gal/hr), booth EU-39 is capable of using 2 gal/hr coating, both are equipped with airless spray system. Particulate Matter (PM) paint overspray from these booths is controlled by dry filters.

(c) One (1) fiberglass priming booth (West Primer Area), identified as EU-45, emitting to stack SV-14. This booth is rated at 0.49 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air spray system. PM overspray is controlled by dry filters.

(d) Three (3) body shop touch up booths, identified as EU-46, EU-47 and EU-48, emitting to stacks SV-15, SV-16 and SV-17 respectively. These booths have a total coating usage of 0.125 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air systems. PM overspray from these booths is controlled by dry filters.

(e) Two (2) ultraviolet (UV) wood finish booths, identified as EU-56, EU-57, emitting to stacks SV-25, and SV-26 respectively. Booth EU-56 and EU-57 are collectively rated at 1 gal/hr, equipped with HVLP spray system. PM overspray from these booths is controlled by dry filters.

(f) Fabrication area (FE-1; FE-2; FE-3; FE-4 and FE-5), where various activities are performed, and emission is vented inside the building. This area is capable of using a total of 1.5 gal/hr of coatings. The coating activity done at FE-4 are applied by spray gun, The rest of the coatings are applied through aerosol cans, caulking gun, or other manual application.

(g) A woodworking shop, equipped with various types of saws, routers, and sanders, with a maximum capacity of 1900 pounds wood per hour, using two baghouses for particulate control, and exhausting at two (2) stacks identified as 1 and 2.

(h) One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.

(i) One (1) surface coating booth (East Primer Booth), identified as EU-35, exhausting to stack SV-4 coating steel bus parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.

(j) One (1) surface coating booth (Upstairs Primer Booth), identified as EU-37, exhausting to stack SV-6, coating fiberglass parts, using dry filter to control PM overspray control, equipped with HVLP and air atomized spray guns.

(k) One (1) surface coating booth (Open Primer Area), identified as EU-44, exhausting to stacks SV-9, SV-12, SV-13, SV-35 and SV-36 coating fiberglass parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.

(l) An open sanding area, identified as EU-43, equipped with various types of sanders, exhausting to one stack shared with EU-44 identified as SV-12, which is equipped with a dry filter to control PM.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Three (3) natural gas fired boilers, rated at four point two (4.2) million British thermal units per hour (MMBtu/hr), exhausting at three stacks identified as 30, 31, and 32.

(b) Two (2) natural gas fired boilers, rated at six point two seven eight (6.278) million British thermal units per hour (MMBtu/hr), exhausting at two stacks identified as 33 and 34.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) surface coating booth partitioned into four (4) sections, identified as EU-49, EU-50, EU-51, and EU-52, exhausting to stacks SV-18, SV-19, SV-20 and SV-21, respectively with a maximum capacity of coating parts for seven (7) vans per hour, using water pan for overspray control, utilized for fiberglass, and plastic substrates, equipped with HVLP and airless spray guns.

(b) Two (2) sealer booths, identified as EU-38 and EU39, emitting to stacks SV-7 and SV-8 respectively. Booth EU-38 is capable of using 0.90 gallon of coating per hour (gal/hr), booth EU-39 is capable of using 2 gal/hr coating, both are equipped with airless spray system. Particulate Matter (PM) paint overspray from these booths is controlled by dry filters.

(c) One (1) fiberglass priming booth (West Primer Area), identified as EU-45, emitting to stack SV-14. This booth is rated at 0.49 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air spray system. PM overspray is controlled by dry filters.

(d) Three (3) body shop touch up booths, identified as EU-46, EU-47 and EU-48, emitting to stacks SV-15, SV-16 and SV-17 respectively. These booths have a total coating usage of 0.125 gal/hr, equipped with High Velocity Low Pressure (HVLP) and air atomized cup air systems. PM overspray from these booths is controlled by dry filters.

(e) Two (2) ultraviolet (UV) wood finish booths, identified as EU-56, EU-57, emitting to stacks SV-25, and SV-26 respectively. Booth EU-56 and EU-57 are collectively rated at 1 gal/hr, equipped with HVLP spray system. PM overspray from these booths is controlled by dry filters.

(f) Fabrication area (FE-1; FE-2; FE-3; FE-4 and FE-5), where various activities are performed, and emission is vented inside the building. This area is capable of using a total of 1.5 gal/hr of coatings. The coating activity done at FE-4 are applied by spray gun, The rest of the coatings are applied through aerosol cans, caulking gun, or other manual application.

(h) One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.

(i) One (1) surface coating booth (East Primer Booth), identified as EU-35, exhausting to stack SV-4 coating steel bus parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.

(j) One (1) surface coating booth (Upstairs Primer Booth), identified as EU-37, exhausting to stack SV-6, coating fiberglass parts, using dry filter to control PM overspray control, equipped with HVLP and air atomized spray guns.

(k) One (1) surface coating booth (Open Primer Area), identified as EU-44, exhausting to stacks SV-9, SV-12, SV-13, SV-35 and SV-36 coating fiberglass parts, using dry filter to control PM overspray, equipped with HVLP and air atomized spray guns.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Minor Source for Prevention of Significant Deterioration (PSD) 326 [IAC 2-2 and 40 CR 52.21]

The sourcewide Volatile Organic Compounds (VOC) input usage, shall be limited to less than 250 tons per 12 consecutive month period, rolled on a monthly basis. Compliance with this limit will make 326 IAC 2-2, PSD and 40 CFR 52.21 not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-2790-00011, issued on April 21, 1994, the BACT determined for the one (1) paint booth with four (4) partitions, identified as EU-49, EU-50, EU-51, and EU-52 shall be as follows:

(a) The use of High Volume Low Pressure (HVLP) spray system, and airless spray system; and

(b) The VOC input usage shall be limited to 134 tons per twelve-month period, rolled on a monthly basis.

Compliance with this limit shall make 326 IAC 8-1-6 (General Reduction Requirements) not applicable.

D.1.3 Volatile Organic Compounds [326 IAC 8-2-9 (Miscellaneous Metal Coating)]

(a) The volume weighted average volatile organic compound (VOC) content of coating applied to steel from the fabrication area (FE-1, FE-2, FE-3, and FE-5) and the North Primer Booth (EU-41) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for extreme performance coatings.

(b) The volume weighted average of the volatile organic compound (VOC) content of coatings used shall be determined using the following equation:

$$\text{lb/gal less water} = \frac{\sum \text{Coating } ([D * O * Q/[1-w * Dc/Dw])}{\sum C}$$

Where:

Dc	=	density of coating	Dw	=	density of water
O	=	weight % organics	Q	=	quantity of coating, gal/unit
W	=	percent volume water	C	=	total coatings used, gal/unit

(c) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets from paint booths EU-38, EU-39, EU-56 and EU-57 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one- tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to this rule, the PM overspray from the surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand

(60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1. 6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC emission limitation contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks (SV-7, 8, 10, 11, 12, 15, 16, 17, 18, 19, 20, 21, 25, 26, 37 and 38) while one or more of the booths being controlled are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(g) A woodworking shop, equipped with various types of saws, routers, and sanders, with a maximum capacity of 1900 pounds wood per hour, using two baghouses for particulate control, and exhausting at two (2) stacks identified as 1 and 2.

(l) An open sanding area, identified as EU-43, equipped with various types of sanders, exhausting to one stack shared with EU-44 identified as SV-12, which is equipped with a dry filter to control PM.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 3.96 pounds per hour when operating at a process weight rate of 1900 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P 0.67$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the baghouses for PM control shall be in operation at all times when the woodworking shop is in operation.

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking shop stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking shop, at least once weekly when the woodworking shop is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 2.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking shop stacks exhaust.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Significant Source Modification.

Source Background and Description

Source Name:	**Starcraft Automotive Corporation**
Source Location:	**2703 College Avenue, Goshen, Indiana 46326**
County:	**Elkhart**
SIC Code:	**3716**
Operation Permit No.:	**039-6130-00011**
Operation Permit Issuance Date:	**June 17, 1999**
Significant Source Modification No.:	**039-12642-00011**
Permit Reviewer:	**ERG/EG**

The Office of Air Management (OAM) has reviewed a modification application from Starcraft Automotive Corporation relating to the construction of the following emission units and pollution control devices:

(h) One (1) surface coating booth (North Primer Booth), identified as EU-41, exhausting to stacks SV-10, SV-11, SV-37 and SV-38 with a maximum capacity of coating steel parts for seven (7) buses per hour, using dry filter to control PM overspray equipped with HVLP and air atomized spray guns.

History

On August 21, 2000, Starcraft Automotive Corporation submitted an application to the OAM requesting to add an additional surface coating to their existing surface coating line. In addition, they wanted to amend their permit to include emission units that were inadvertently omitted from the Part 70 permit, and to clarify some inconsistencies found in the permit. These omissions and inconsistencies are included in the administrative amendment (AA 039-12782-00011) that corresponds to this Significant Source Modification. Starcraft Automotive Corporation was issued a Part 70 permit on June 17, 1999. On April 20, 2000 Starcraft Automotive Corporation was issued their first Significant Permit Modification.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
SV-10	Bus Primer Booth	35	-	16,400	Ambient
SV-11	Bus Primer Booth	35	-	16,400	Ambient
SV-37	Bus Primer Booth	35	-	16,400	Ambient
SV-38	Bus Primer Booth	35	-	16,400	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 21, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (2 pages).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	20.3
PM-10	20.3
SO_2	--
VOC	38.9
CO	--
NO_x	--

HAP's	Potential To Emit (tons/year)
Xylene	2.14
Ethylbenzene	0.5
MEK	0.71
TOTAL	3.35

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2.7-10.5(f) as the modification has a potential to emit greater than twenty-five (25) tons per year of VOC.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for ozone. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.615
PM-10	1.12
SO_2	0
VOC	less than 250
CO	9.1
NOx	10.8

(a) The source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the TSD for Permit Modification 039-11338-00011.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Bus Primer Booth	20.3	20.3	--	38.9	--	--	5.35

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

(a) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Facilities constructed after July 1, 1990 of the types described in 326 IAC 8-2-9, which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls are subject to 326 IAC 8-2-9. Therefore, the North Primer Booth (EU-41) is subject to 326 IAC 8-2-9, because the actual emissions are greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied by spray guns at this primer booth are limited to 3.5 pounds per gallon less water for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The coating used in emission unit (EU-41) contains 3.425 pounds per gallon VOC less water, therefore, the coating meets the limit in 326 IAC 8-2-9 of 3.5 pounds per gallon less water for extreme performance coatings.

(b) 326 IAC 6-3-2 (Process Operations)
The PM emissions from the surface coating operation shall be limited using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

The dry filters shall always be in place, and shall always be in operation whenever the paint booths are in operation.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks (SV-7, 8, 10, 11, 12, 15, 16, 17, 18, 19, 20, 21, 25, 26, 37 and 38) while one or more of the booths being controlled are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-12642-00011.

Department of Environmental Management
Office of Air Management

Addendum to the Technical Support Document for a Part 70 Significant Source Modification

Source Name:	Starcraft Automotive Corporation
Source Location:	2703 College Avenue, Goshen, Indiana 46326
County:	Elkhart County
SIC Code:	3716
Operation Permit No.:	039-6130-00011
Permit Reviewer:	ERG/EG

On November 5, 2000, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Goshen, Indiana, stating that Starcraft Automotive Corporation, had applied for a operating permit to operate a stationary source that produces custom recreational vehicles. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Responses to Starcrafts' Comments

On November 22, 2000, Starcraft Automotive Corporation submitted comments on the proposed Significant Source Modification. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted.

Comment 1:

The proposed modification document indicates Starcraft is “constructing” a new surface coating booth (EU-41) at the site, as defined in 326IAC2-2-1(k). This does not reflect the true situation and does not accurately reflect the request made in the August 14, 2000 submittal. This booth, originally called the fiberglass sanding and priming booth, was included as part of the original Title V application in 1995 as an emission unit that emitted particulate matter and volatile organic compounds (VOCs). As noted in the original Title V permit and the submittal for the current permit modification, the booth is part of the central painting area that was constructed before 1975. There has been no construction at this site as defined in 326 IAC 2-2-1(k); rather, this booth was excluded from the original Title V permit by the permit writer.

We first attempted to rectify this situation during the first significant permit revision submittal (SPM 039-11338-00011), but identified booth EU-41 (and three others) as insignificant sources of VOCs. After an inspection by the Indiana Department of Environmental Management (IDEM), it was suggested by the inspector that Starcraft include all of the spray booths at the facility as significant sources, due to the difficulty in meeting the documentation requirement to prove that these booths were insignificant VOC sources.

Three of the four booths (EU-35, EU-45, and EU-43) were added to the permit as part of an administrative amendment (AA039-12782-0001) arising from this submittal. A change in the coating and the material coated in booth EU-41 had occurred since the first permit revision submittal, requiring a revision in the potential VOC emissions for booth EU-41. We have updated the name of the booth to reflect the new use, but the booth identifier, EU-41 remains the same. No construction or change in the booth configuration has occurred, only the change in coating and type of material that is coated. Booth EU-41 was originally used to sand fiberglass parts, and for application of small amounts of surface coatings to these parts. It was determined at the time of the first permit revision submittal in 1999 that the hourly and daily emissions were below the level deemed to be significant for VOCs.

We formally request the modification be termed a significant permit modification instead of a significant source modification. We contend that the coating change does not constitute a significant source modification, as no change or construction is occurring, but is actually a significant permit modification of an insignificant emission source to a significant emission source. This change fits the definition of a permit modification under 326 IAC 2-7-20, and should be handled under the requirements of 326 IAC 2-6.1-6(I)(1)(e) due to a potential increase in VOCs over 25 tons a year.

There are no other areas of concern identified by Starcraft in the proposed changes to this permit.

Response to Comment 1:

According to the definition of “construction” in 326 IAC 2-2-1(k) “any physical change or change in the method of operation (including fabrication , erection, installation, demolition, or modification or an emission unit) which would result in a change in actual emissions.” Emission unit EU-41 meets this definition, there was a change in the method of operation that increased emissions and as a result is considered a construction.

The source suggested that the modification should be considered a significant permit modification as defined in 326 IAC 2-6.1-6(I)1(e). The source would be correct if this was a modification to a Minor Source Operating Permit (MSOP) but, because this modification increases emissions to a Part 70 permit it is considered a “significant source modification” as defined in the Part 70 rules 326 IAC 2-7-10.5(f).

No changes will be made to the permit as a result of this comment.

Appendix A: Emissions Calc
VOC and Particulate from St
Company Nan Starcraft Automotive Corpor
Address City I 2703 College Avenue, Goshe
TV OP 039-12642-00011
Plt ID: 039-12642
Reviewer: ERG/EG
Date: 10/06/00

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC (lb/hr)
EU-41	Black N0001 HN	8.53	40.15%	0.00%	40.15%	0.370	7	3.42	8.87

State Potential Emissions **Add worst case coating to all solvents** **8.87**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Sum of Coating Emissions + Sum of all Solvent Emissions

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Potential VOC (lb/day)	Potential VOC (tons/yr)	PM Potential (ton/yr)	Transfer Efficiency
212.90	38.85	20.27	65%
212.90	**38.85**	**20.27**	

Appendix A: Emission Calculations
HAP Emission Calculations
Company Nan Starcraft Automotive Corporation
Address City I 2703 College Avenue, Goshen, 46526
MSOP: 039-12642-00011
Plt ID: 039-12642
Reviewer: ERG/EG
Date: 10/06/00

Emission Unit	Material	Density (lb/gal)	Gallons of Material** (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % MEK	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
EU-41	Black N001	8.37	0.278	7	3.00%	0.70%	1.00%	2.14	0.50

Total State Potential Emissions **2.14** **0.50**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
** Gallons of material for EU-41 is reduced by 25% because a non-HAP solvent is used to thinning the coating by 25%.
Therefore the actual Gallons of coating (Black N001) per unit is reduced.

MEK Emissions (ton/yr)
0.71

0.71

Hapcalc.wk4 9/95